

CLARK HILL PLLC
PAOLA M. ARMENI
Nevada Bar No. 8357
Email: parmeni@clarkhill.com
1700 S. Pavilion Center, Dr. Ste., #500
Las Vegas, Nevada 89135
Tel: (702) 862-8300
Fax: (702) 778-9709
Attorney for Defendant Gerard Russo

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.
ALEXANDER WALLACE VEGA, BRADLEY
MICHAEL RAU, DAVID OWEN IVAR,
GERARD JUDE RUSSO, and TARON
AGAZARYN,

Defendants.

CASE NO. 2:21-cr-00302-JCM-DJA

STIPULATION AND ORDER TO CONTINUE SENTENCING
(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Gerard Jude Russo, Defendant, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, PLLC, the Plaintiff, by and through Jason Frierson, United States Attorney, and Joshua Brister, United States Attorney, that the Sentencing in the in the above-captioned matter, currently scheduled for April 12, 2023 be vacated and set to July 7, 2023 at 10:00 a.m..

This Stipulation is entered into for the following reasons:

1. Paola Armeni was appointed by this Court as counsel for Mr. Russo on December 14, 2021.
2. Sentencing in this matter is currently scheduled for April 12, 2023 and the parties have agreed to a continuance to July 7, 2023 at 10:00 a.m.

1 3. Defendant Gerard J. Russo is having spine surgery on March 22, 2023 and will need until
2 June 22, 2023 to recover.

3 4. Federal Rule of Criminal Procedure 32(b)(2) permits this court to continue a
4 sentencing for good cause. Good cause exists in this case.

5 5. Additional time requested herein is not sought for purposes of delay and the denial of this
6 request for a continuance could result in a miscarriage of justice.

7 2. For all the above-stated reasons, the ends of justice would be best served by the
8 continuance of the deadline for said sentencing.

9 3. This is the First Request for a continuance of the Sentencing deadline.

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11 JASON FRIERSON
12 UNITED STATES ATTORNEY
DISTRICT OF NEVADA

CLARK HILL PLLC

13 /s/ Joshua Brister
14 JOSHUA BRISTER
Assistant United States Attorney

/s/Paola M. Armeni
PAOLA M. ARMENI

15 DATED this 20th day of March, 2022.

DATED this 20th day of March, 2022.

UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,
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v.
ALEXANDER WALLACE VEGA, BRADLEY
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FINDINGS OF FACT AND CONCLUSIONS OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

CONCLUSIONS OF LAW

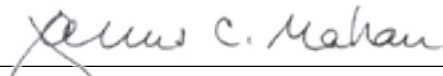
Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. The current Sentencing date is April 12, 2023.
2. On or about October 10, 2022, Defendant Gerard Russo entered into a Plea Agreement.
3. Defendant Gerard Russo has appeared in this case, is not in custody and has agreed to a continuance with the government.
4. Defendant Gerard J. Russo is having spine surgery on March 22, 2023 and will need until June 22, 2023 to recover.
5. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
6. For all the above-stated reasons, the ends of justice would be best served by the continuance of Sentencing date.
7. This is the First Request for a continuance of the Sentencing date.

ORDER

IT IS HEREBY ORDERED that the Sentencing date for April 12, 2023, at the hour of 10:30 a.m. is hereby vacated and continued to **July 7, 2023 at 10:00 a.m.**

DATED: March 20, 2023.



UNITED STATES DISTRICT COURT